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January 18, 2022

P. Kevin Castel
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007
Via ECF

Re: *United States v. Serhan*, 19 Cr. 764 (PKC)

Dear Judge Castel:

Please accept this letter as an application, with government consent, for an order continuing the status conference, currently scheduled for February 1, 2022 at noon, to any date convenient to the court during the first week of March, 2022, and further ordering that the continued conference be conducted telephonically rather than in person due to Covid.

The current posture of the case obviates the need for the conference at this time. Mr. Serhan has been provided with substantial discovery which he has been reviewing. We had dispatched the defense Spanish speaking paralegal to visit Mr. Serhan at the MDC to go over sensitive discovery and review significant portions of recordings and compare them to transcripts. This process has been interrupted by disruption of MDC personal visits.

At this time, the defense does not anticipate pretrial motions as most of the government case is premised on recorded consensual conversations between Mr. Serhan and prospective government witnesses.

A recent disclosure by the government has created the opportunity for the defense to

commence negotiations toward possible settlement of this case short of trial, negotiations which the defense would start before the proposed March date.

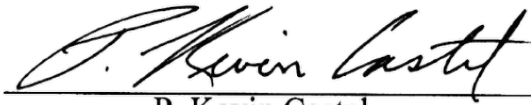
If this is agreeable, may I impose upon Your Honor to have this letter “so ordered” and published via ECF. Thank you for your consideration. I remain,

Respectfully,
s/GRGoltzer
George R. Goltzer

cc: All parties via ECF
GRG/ms

Upon the application of defense counsel, consented to by the government, the conference originally scheduled for February 1, 2022 is adjourned to March 4, 2022 at 12:00 p.m. The conference will proceed telephonically. Dial-In No.: 1-888-363-4749, Access Code: 3667981. I find that the ends of justice will be served by granting a continuance and that taking such action outweighs the best interest of the public and the defendant in a speedy trial. The reasons for this finding are that the grant of the continuance is necessary to allow the parties to continue to work towards a disposition in the case. Accordingly, the time between today and March 4, 2022 is excluded. SO ORDERED.

Dated: 1/19/2022



P. Kevin Castel
United States District Judge